

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FEDERAL TRADE COMMISSION,

Case No. 20-CV-4432-LAK

Plaintiff,

v.

RCG ADVANCES, LLC, RAM CAPITAL
FUNDING, LLC, ROBERT L. GIARDINA,
JONATHAN BRAUN, and TZVI REICH,

Defendants.

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**NOTICE OF CORRECTION TO RECORD
OF HEARING HELD ON JULY 20, 2022**

Counsel for Defendants RCG Advances, LLC and Robert Giardina hereby provides notice and correction regarding the mistaken reference to the “IRS” instead of the “FTC” at the hearing held on July 20, 2022 in this matter:

During the hearing, counsel for Defendants, Alan Kluger, stated with regard to attorney David Feingold that “he’s been sued with an \$18 million IRS judgment.” Following review of the transcript of the hearing, and realizing his mistake, Mr. Kluger notifies the Court and all parties that he meant to say with regard to David Feingold that “he’s been sued with an \$18 million *FTC* judgment.”

Respectfully Submitted,

**KLUGER, KAPLAN, SILVERMAN, KATZEN
& LEVINE, P.L.**

By: /s/ Alan J. Kluger
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